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# **HOFLAND & TOMSHECK** Joshua Tomsheck, Esq. State Bar of Nevada No. 009210 iosht@hoflandlaw.com 228 South 4th Street, 1st Floor Las Vegas, Nevada 89101 (702) 895-6760 (702) 731-6910 facsimile Attorney for Defendant FOR THE DISTRICT OF NEVADA

# IN THE UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA Plaintiff, vs. VINCENT SULLIVAN, Defendant.

Stipulation and Order to Continue Sentencing (Second Request)

Case No.: 2:20-cr-00299-GMN-EJY

IT IS HEREBY STIPULATED AND AGREED, by and between JASON M. FRIERSON, United States Attorney, and KIMBERLY ANNE SOKOLICH, ESQ., Assistant United States Attorney, counsel for the United States of America, and JOSHUA TOMSHECK, ESQ., counsel for Defendant VINCENT SULLIVAN, that the Sentencing and Disposition currently scheduled for November 15, 2022 at 10:00 a.m. be continued to a date convenient for the Court, between January 3, 2023 and January 13, 2023 (excluding January 10, 2023).

This stipulation is entered into for the following reasons:

- 1. This is the second Sentencing and Disposition continuance request.
- 2. There is a conflict with the date currently set for Sentencing and Disposition and the suggested dates are viable dates for the parties to proceed with the same.
- 3. The parties agree to the continuance.
- 4. The defendant is not in custody, and does not object to this continuance.

### Case 2:20-cr-00299-GMN-EJY Document 88 Filed 10/19/22 Page 2 of 4

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## **HOFLAND & TOMSHECK** 1 Joshua Tomsheck, Esq. State Bar of Nevada No. 009210 2 josht@hoflandlaw.com 228 South 4th Street, 1st Floor 3 Las Vegas, Nevada 89101 (702) 895-6760 4 (702) 731-6910 facsimile 5 Attorney for Defendant 6 7 8

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

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VINCENT SULLIVAN,

Defendant.

Case No.: 2:20-cr-00299-GMN-EJY

Stipulation and Order to Continue Sentencing (First Request)

#### FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the

#### Court finds that:

- 1. This is the second Sentencing and Disposition continuance request.
- 2. There is a conflict with the date currently set for Sentencing and Disposition and the suggested dates are viable dates for the parties to proceed with the same.
- 3. The parties agree to the continuance.
- 4. The defendant is not in custody, and does not object to this continuance.
- 5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
- 6. For the above stated reasons, the parties agree that a continuance of the Sentencing and Disposition would best serve the ends of justice in this case.

1	<u>ORDER</u>
2	IT IS HEREBY ORDERED, that Sentencing and Disposition currently scheduled for
3	November 15, 2022 at 10:00 a.m. be continued to <u>4th</u> day of <u>January</u> , 2023 a
4	11:00 A.M.
5	
6	DATED 19 day of October , 2022.
7	
8	LINITED STATES DISTRICT HIDGE
9	UNITED STATES DISTRICT JUDGE
10	
11	Respectfully Submitted By:
12	/s/ Joshua Tomsheck
13	Joshua Tomsheck, Esq. Nevada Bar No. 009210 Attorney for Defendant
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